

BUILDING SECURITY

- Lobby/Front Desk area must be attended at all times during normal hours of operation.
- Managers and Supervisors should be on the floor of the warehouse with their people, not behind a desk in an office.
- To ensure the security of our facilities, a Manager or higher authority shall be present at all times while employees or anyone else has access to the inside of our inventory locations.
- All visitors must register at reception desk. While in facility, visitors must be accompanied by an employee at all times.
- All service personnel must enter and exit the facility through the front door, register at the reception desk and be accompanied by an employee while in the building.
- All facilities with inventory will utilize a security camera and recording system recommended by KCN Corporate. The only exception is a facility located inside of a correctional facility that prohibits the cameras.
- KCN Corporate will manage the installation of the security camera system in your facility. The minimum areas to be monitored are: order processing areas, shipping/receiving areas including dock doors, high security product areas, all entry and exit doors and the front office door which the employees will use to enter and exit the facility.
- Regions will be required to rent a lift for the installation of the security camera system, and pickup/drop off the installers from the airport/hotel.
- Security cameras will record all activity, 24 hours a day, 7 days per week. All recorded activity will be kept on file for a period of at least 30 days.
- The entire recording system including DVR/VCR's, monitors, and video tapes will be kept in a secure and locked environment. No employee outside of management is to see the system capabilities other than the cameras. This may require storing the system in a locked cabinet within a locked office.
- After hours recorded activity will be reviewed by the Warehouse Manager the following morning. Any suspected problems will be reported immediately to the VP/GM and investigated. The findings will be documented and sent to the VP/Operations at Keefe Group Corporate.
- All facilities will utilize a security alarm system linked to the local law enforcement agency. The only exception is a facility located inside of a correctional facility that prohibits the system.
- All entry and exit doors will be locked at all times. Doors which must remain unlocked for emergency exit purposes must be equipped with an alarm that sounds when the door is opened and a tamper proof seal. Batteries will be changed when clocks are changed for day light savings time around the country.

- All dock doors will remain closed and locked unless being used. Screens may be installed if they are capable of being locked.
- All employees will enter and exit through one designated door, which is covered by a security camera. All other doors are to remain locked or secured by alarm and seal.
- One outside door for shipping and receiving will be unlocked daily by the Warehouse manager for use by the truck drivers. This door will have a wire cage around the entry area so the driver cannot access the rest of the building and have a “No Exit” sign on it. The wire cage will remain locked at all times so no person (driver or employee) can enter or exit through it.
- All trash dumpsters and compactors shall be equipped with a locked lid or chute system, which prohibits retrieval of product.
- The Warehouse Manager or higher authority shall inspect the facility by walking around the inside and outside of the entire building two times per day. One time will be a random check during the day and the other will be immediately after the employees have left for the day. A security checklist will be forthcoming. Check for security problems and broken lights and or cameras.
- After hours access to the facility shall be limited to the VP, Warehouse Manager, Assistant Manager, Business Manager, Sales staff, and KCN Regional Manager. This includes access to keys and alarm codes.
- Lockers or other secure areas should be provided for employees’ personal belongings. No purses, bags, coats etc. should be allowed in work areas.
- Cleaning staff should only be allowed in the building during normal work hours.
- Alarm codes shall be changed quarterly when conducting inventory.

Security System Maintenance Procedures

As per the KCN Best Business Practices Guide, all KCN locations which carry inventory will utilize a security camera and recording system. The only exception is a facility located inside of a correctional facility which prohibits the system. The minimum areas to be monitored are the order processing areas, shipping and receiving areas, dock doors, high security product areas, all entry and exit doors, parking lot, and the front office door which the employees will use to enter and exit the facility. The general maintenance procedures for these systems are as follows:

The security cameras will be set to record all activity, 24 hours a day, 7 days per week. The VCR's should be set to record in the 96 hour mode. In doing so, the tape may record consistently for 96 straight hours before requiring change. All recorded activity is in real time, with no pauses, delays, or skips in the recorded footage.

Each VCR should be labeled a letter starting with the letter A (i.e. A, B, C, and D for a 16 camera, 4 VCR system). The tapes should be labeled according to the VCR and the tape number (i.e. the tapes for VCR A should be labeled A1, A2, A3, A4, A5, A6, A7, A8, A9). In doing so, the process of locating tapes to view previously recorded activity is organized. Additionally, the rotation will safeguard against recording over activity which is more recent than 30 days. Tapes should be changed 2 times per week in accordance with the following days and times:

Monday 8:00 a.m.

Friday 8:00 a.m.

(Note: This policy will require 9 tapes per VCR)

Each VCR and monitor will display and record the activity of 4 cameras, simultaneously. The screen of the monitor is split into 4 quarters which displays each of the 4 cameras. Each camera is assigned to a number which displays on the monitor during both live and recorded playback. Additionally, the monitor will display the current date and time during both live and recorded playback. In the event a camera is turned off or is not recording, the monitor will display solid black in that quarter of the screen. In the event all 4 cameras are turned off or are not recording, the entire screen on your monitor will be solid black.

Periodically throughout the day, schedule short times to view activity on the monitors. In doing so, be sure to check that all cameras are on and are recording.

Any and all suspicious activity and suspected problems will be reported immediately to the Group V.P. and investigated thoroughly. The findings will be documented and sent to the Operations Manager at KCN Corporate.

Any discoveries of theft or breaches in security will be reported immediately (same day) to the VPGM, VP/Controller, or Operations Manager at KCN Corporate.

Building Safety and Security Check List

In accordance with the "Building Security" section of the KCN Best Business Practices Guide, the form as outlined below is to be completed daily to ensure compliance with building safety and security. Additionally, these daily completed forms are to be maintained on-site in a binder, which will be reviewed quarterly by the Operations Manager at Keefe Corporate. Any breaches and/or concerns should be documented in the comments section of the form and resolved to ensure building safety and security.

NAME: _____ **DATE:** _____

INITIALS

- Ensure all lights, both interior and exterior, are working properly. Any non-working lights should be noted and scheduled for repair within 7 days. _____
- Ensure all doors and windows are locked, armed, and sealed. The seal on each door should be checked to ensure the door has not been opened. Broken seals will be investigated immediately by reviewing the activity recorded on the security camera system. _____
- Ensure the trap doors on the dumpster and compactor chutes are closed and locked. _____
- Ensure all electronic devices are turned off and if necessary, unplugged. This includes items such as coffee makers, televisions, radios, heaters, fans, copy machines, etc. _____
- Ensure all fork lifts are properly stored and recharged. _____
- Ensure all dropped trailers are secured and locked. _____
- Ensure all delivery vehicles are locked, secured, and parked in a lighted area, preferably behind a locked gate. _____
- Ensure all high security product is secured in the locked cage. _____
- Ensure all building, delivery vehicle, and high secure keys are secured and locked. _____
- Ensure all gates are secured and locked. _____
- Ensure the entire camera recording system is operating and secured in accordance with the Camera Recording Maintenance Check List. _____
- Ensure all fire extinguishers, eye wash kits, first aid kits, and other safety related equipment is working and in the correct location of the facility. _____
- As you walk around the inside and the outside of the entire facility, look for any potential safety and security issues or violations. _____
- Any and all breaks in security will be immediately reported to the highest ranking V.P. of that region. The issue will be investigated immediately and reported to the Operations Manager at Keefe Corporate. _____

Comments/Corrections: _____

Personal Items

It is the policy of Keefe that personal items are never permitted in the work areas of our facilities. Upon entering the Keefe facility to perform one's job duties, all employees must report immediately to their company provided locker to secure all personal items. Once these personal items are secured in the locker, the items are to remain there until the employee is excused from performing their job duties (i.e. break, lunch, or dismissal from the facility at the end of the work shift). Once employees retrieve their personal items, access inside our facilities is restricted to the lunch and break rooms only. Employees possessing personal items are never permitted in the working areas of our facilities, even during lunch and break periods. Upon completion of one's lunch or break period, employees must secure their personal items back into their locker.

Personal items are defined as any item which is not approved by management, to be used in the normal course of performing one's daily job duties. Examples of personal items include, but are not limited to the following:

Keys, combs, brushes, makeup, purses, pocketbooks, money, tobacco, lighters, matches, food items, beverages, coats, jackets, gloves, hats, scarves

All items which are approved by management to be used in the normal course of performing one's daily job duties, will be provided to the employee by Keefe. Such items include, but are limited to the following:

Uniforms, pens, markers, highlighters, tape, calculators, folders, paper, clip boards

Any violation of this policy will result in disciplinary action, up to and including termination.

Tool Control Policy

It is the policy of Keefe that all tools will be approved by Management, prior to admittance and acceptance into our facilities. Approval by Management will be based primarily upon the specific purpose the tool will serve as it directly relates to the performance of our daily operations.

Due to the security aspects of our business, tools are not allowed in the highly secure areas (order processing, taping, boxing) of our facility. Employees possessing tools should never enter these highly secure areas. On an extremely rare occasion which requires a tool to be used in these highly secure areas, a Manager is the only authorized person who may bring the tool into these areas. All order processing must cease in the area until the Manager has completed the task and removed the tool from the area.

Box knives are the most frequently utilized and the most dangerous tool we possess. As such, the potential for losing these tools and our exposed liability is greater than all other tools. To ensure box knives are not misplaced, they are to be attached to the employee's wrist or belt loop, via a cord or chain. Samples may be obtained from the KCN Operations Manager. Box knives are not allowed to be detached from the employee who has checked the tool out. As with all tools, box knives are never allowed in the highly secure areas. As with all tools, an employee who has a box knife checked out may not process an order.

All approved tools will be secured and accounted for at all times by the Warehouse Manager. In doing so, all Keefe facilities will utilize a daily log book listing the tools which are approved and maintained at that facility. Each individual tool will be assigned a number which is labeled on the actual tool itself, and listed in the corresponding "Tool Master Log" (see attached). The approved tools will be maintained on a pegboard. The pegboard should clearly display each tool's assigned number and an outline of the actual tool itself.

A quick review of the pegboard will easily identify the exact tool(s), by type and number, which are checked out. Referencing the tool number in the Tool Master Log will easily identify the employee in which tool(s) have been assigned to.

The tools and Tool Master Log are to be maintained in the locked high security cage at the facility. The high security cage is not accessible to any employee outside of Management.

Each completed daily log should be maintained historically in the book so that Management can review and determine what tools were checked out and returned in the past, by employee, and working day. This listing will also serve at a minimum, the following functions:

- 1) To ensure only the tools approved by Management, are admitted and maintained at the facility. Tools not on the listing are not permitted into the facility.
- 2) To ensure all tools are accounted for at all times. Tools will be checked out by authorized employees on an as needed basis and checked back in upon completion of their use.
- 3) To ensure all tools are utilized safely in accordance with their intended use and only in the authorized areas of our facilities.

At the start of a work shift, the Warehouse Manager should perform an audit to ensure all tools are accounted for and secured. The Warehouse Manager should then open a new page of the Tool Master Log.

An employee requiring a tool must check the tool out from the Warehouse Manager. The Warehouse Manager will record this process in the Tool Master Log. In checking tools out, the Warehouse Manager will ensure that the employee is performing a duty which requires use of the tool. Additionally, the Warehouse Manager will ensure the authorized employee is knowledgeable on safely using the tool as well as the areas of our facility in which the tool is not permitted.

It is also the responsibility of the employee checking the tool out, to know all of the rules and policies pertaining to the tool, its' safe and intended use, all areas the tool is not permitted in, and its' return policy. Employees should never leave a tool lying around. Additionally, employees should never loan a tool to another employee. Once an employee checks a tool out, it is their responsibility to maintain complete possession of that tool until it is checked back in.

Upon completion of the tool's use, the employee must check the tool back in with the Warehouse Manager. The Warehouse Manager will record this process in the Tool Master Log. In doing so, the Manager should examine the tool to ensure it has been returned in a safe and working order. Tools which are returned in a damaged condition will be discontinued and replaced to ensure safety.

During the 3 daily breaks (2 short breaks, 1 lunch break), the Warehouse Manager will ensure that all employees who have a tool checked out, are still in possession of their tool. The Warehouse Manager will document the results of these 3 audits on the Tool Master Log. In the event a tool is discovered missing, the Warehouse Manager will immediately contact the KCN Operations Manager or higher authority. Order processing will cease until the missing tool is located or the Warehouse Manager receives permission to proceed.

Upon completion of the work shift, the Warehouse Manager will perform an audit to ensure all tools were returned and are accounted for. Upon completion of a successful audit, the Warehouse Manager will close the daily Tool Master Log. In the event of a missing tool, the Warehouse Manager will immediately contact the KCN Operations Manager or higher authority. Orders will not ship until the missing tool is located or the Warehouse Manager has received permission to release such orders.

Any violation of this policy, as well as lost tools, will result in disciplinary action, up to and including termination.

Vehicle Use Policies and Procedures

- Safety is highest priority when operating Keefe vehicles, therefore managers will utilize employees who are proven to be knowledgeable, responsible, and capable. Hiring an outsider to the company and handing them keys to a vehicle without any first hand knowledge of their performance, job knowledge, and level of responsibility is not allowed. If you would not be comfortable allowing the person to drive your personal vehicle, you should not allow them to drive a Keefe vehicle. It is recommended that the employee work in the facility for a reasonable period of time before allowing them to drive so that you can measure and ensure these qualities.
- The Manager will be responsible for completing a driver pre-qualification checklist for each driver prior to the driver being assigned driving duties, as well as being responsible for providing the driver with a pre and post vehicle inspection checklist and specific and exact, roundtrip routes. These routes should include any and all necessary stops such as refueling, maintenance, weight stations, food, etc. The driver is expected to follow the exact route without deviation. Any stops not specifically listed on the route are considered as “unnecessary” and shall not be performed unless pre-approved by the Manager or higher authority.
- Seat belts will be utilized by all occupants anytime the vehicle is in motion. Drivers shall obey all posted speed limits as well as consider current traffic and weather conditions relative to their speed while driving.
- Drivers shall not engage in any activities which would draw their attention away from the purpose of operating the vehicle in a safe and attentive manner, this may include but is not limited to, reading maps, taking notes, talking on cell phones etc...
- The driver shall not take the vehicle through any type of drive through area such as a fast food establishment or bank.
- The driver of a truck should always use a *ground guide* when backing, if personnel are readily available.
- If operating vehicles on a correctional facility compound the driver shall always obey the established speed limit and always stop the vehicle when inmates and correctional staff *on foot* may be passing on any side of the vehicle.
- When operating trucks equipped with lift gates, all persons should stay “well clear” of the lift gate while it is being operated. The operator of the lift gate shall insure that it is safe to lower or raise the lift gate before proceeding, while the lift gate is operating, the truck engine needs to be running [for battery power] for this procedure, when the lift gate procedures are being conducted on a correctional facility compound an additional employee must be present who, must remain in the drivers seat of the vehicle in control of the vehicle at all times for security purposes.
- The lift gate should only be used to safely raise and lower product and should never be used as a working area to retrieve the contents of the vehicle. This can result in the employee falling down from the lift gate. Instead, the employee should stand and work from inside the vehicle, and push the contents of the vehicle (i.e., orders, carts, pallets, etc.) onto the lift gate. In doing so, if the

employee falls, they will remain inside the vehicle and will not fall off the vehicle to the ground which can cause serious injury.

- When placing equipment which has casters or wheels on the lift gate (i.e. pallet jack, carts, etc.), the equipment must be made stationary and immobilized before using the lift gate. This is to prevent the equipment and load from rolling off the lift gate. In the case of a pallet jack, the load or pallet must be lowered before using the lift gate.
- Any load placed in trucks shall be secured to ensure that the load does not move around or shift, Keefe warehouses have straps available for securing any load, the operator of the truck shall ensure that straps are available on a truck for picking up loads at other facilities.
- Keefe vehicles shall never be left unsecured, while unattended. Additionally, while on a correctional facility compound, vehicle keys shall never be in the ignition unless the driver or other employee is actually sitting in the driver's seat.
- Utilize safety and operational training provided by Ryder or other vehicle providers. Training includes videos, seminars, and testing. It is important to get to know your local vehicle provider contact, which will be able to assist in your training efforts.
- Ensure that the vehicles are maintained in a safe and working condition. If the vehicle is not in a safe and working condition, do not allow the vehicle to be utilized in the provision of our services. To this end, personnel assigned to pick up vehicles from Ryder or other providers will inspect the vehicle and note any damage prior to signing the pickup agreement. This same inspection process should occur when turning the vehicle in to the provider.
- Preventative maintenance for our Ryder vehicles is provided by Ryder at no additional cost. Most Ryder facilities are open 24 hours. Vehicles can be dropped off at the end of the day and picked up before work starts the next day. Your local Ryder contact will help you coordinate this.
- In the event of an accident, the driver should immediately contact their Manager or higher authority and follow the accident procedures provided in the Centric Group Accident Kit provided for every vehicle. It is most important that the driver be completely honest and truthful when reporting the accident and explaining the details. If the driver does not know an answer or is unsure of any details, the driver should indicate such.
- The Manager will then contact Centric Group immediately upon notification from the driver. A complete and thorough investigation will be conducted by the Manager and reported to Centric Group. Both the driver and Manager will be required to cooperate fully with the investigation by Centric Group and the insurance company.
- The driver should utilize the accident kit provided by Centric Group. This means using the entire roll of film to take pictures of the vehicle, accident, surroundings, other party, etc., and completing the accident report. The driver must also contact local law enforcement to file a report.
- Drug tests must be performed following every accident. If the accident requires medical treatment, the clinic should perform the test. If no medical attention is necessary, the employee should be sent to a testing facility approved by the Manager.

- Maintain reliable, responsible, and experienced backup drivers. The driver should not be sent back out on the road with a vehicle until a thorough investigation is completed. The results of some accidents could result in a job change and or disciplinary up to and including termination in the event that laws or company policies were violated.
- Learn from previous accidents. Develop solutions and implement changes which reduce the probability for future accidents. Share the experience, solution, and change with the Keefe Group Operations Department so the information can be passed on to other regions.

HURRICANE BACK UP PLAN

In the unlikely event that the distribution center is rendered as unusable:

- First = All employees are to follow local emergency guidelines to the letter and keep the safety of their families first.
- Second = All employees are to follow the facility guidelines to the letter and keep their safety first.
- Third = All employees are to power down any electrical equipment and raise inventory above floor level as much as practical before they leave the workplace. Employees must leave the workplace when their shift is over, the facility directs them to leave, or the employee is directed to leave by their own common sense.
- Safety of our employees comes first in all decisions.
- After the hurricane leaves the area all employees are directed to make contact with their Regional Manager within 12 hours if possible to confirm their safety and assess their needs. If an employee cannot be contacted within 12 hours, the emergency phone list for that region will be implemented and the employees will try to make contact with the unaccounted for employee.
- Regional Managers will keep the VP Operations updated regularly as to the status of our employees and facilities. Minimum = 1x per hour for the first 12 hours and as needed after.
- VP Operations will assess the situation, inform the President C.O.O., and Centric Group, and locate any special resources that may be required.
- The on-site warehouses across the region carry at least a 2 week supply of inventory at all times.
- Virginia inmates may lose a day or two of sales or we would have to credit their accounts for anything that was previously scanned. We do not see this as a major issue and they would be able to rebound within 24 hours of getting power back on.
- Bulk product can be shipped to facilities directly from any other distribution center (i.e. Texas, Atlanta, Missouri, Ohio, etc.). Since the facilities receive their products via transfers in ALICE, it is extremely easy to convert any required transfers to another distribution center for fulfillment.
- Any "special" type of items that are not normally stocked in our major distribution centers are directly shipped to the facilities by the vendors (i.e. ice cream, sandwiches, soda).
- The only other item which would not necessarily be carried by the other distribution centers is tobacco. However, tobacco can be shipped to the facilities direct by either Mackoul, Lane LTD, (our distributors) and/or Republic (the tobacco manufacturer).

On-site Employee Safety and Security Procedures

Security and safety are the number one priorities while in a correctional environment. It is the responsibility of Keefe to provide a safe and secure working environment for all of its' employees. It is the responsibility of employees to perform all assigned duties in a safe and secure manner. If at any time an employee feels that they are in, or have been exposed to, a dangerous or unsafe situation, the employee must immediately notify their supervisor.

Supervisors share a responsibility for the safety and security of the employees under their supervision in a correctional environment. Supervisors should be mindful of any and all activity, in and around their employees, while they are performing their duties at the facility. Upon notification from an employee concerning a threatening or unsafe situation or experience, the supervisor should address the problem without hesitation and notify the next level of management including the Regional Vice President as well as the Facility.

If at any time, the employee feels that the supervisor did not satisfactorily resolve the threatening or unsafe situation or experience, the employee should contact the Regional Vice President.

The following guidelines must be followed by every employee that has any contact with our customers (correctional staff or offenders):

- As a representative of Keefe, each employee must always maintain a positive and courteous attitude toward our customers. Our customers are anyone within a correctional environment, including but not limited to, correctional staff, administrative staff, and offenders.
- Our customers must be treated at all times, with the utmost respect, in a courteous and helpful manner. They are the sole reason we are in business.
- The proper manager within your region will address all problems with a customer. Notify your supervisor of any and all problems.
- At no time is an employee to engage in an argumentative conversation with any of our customers. Should you perceive the customer to be "wrong", your job is not to correct the customer but to maintain a courteous and helpful manner until you can report the problem to your supervisor.
- Should a customer request you to perform a task, which contradicts company policy, you should maintain a courteous and helpful manner and contact your supervisor immediately.

Every employee while working in a correctional environment must follow the following guidelines:

- Employees should always report to the designated facility location for security clearance, prior to working inside of a correctional environment. Likewise, employees should always report back to the designated facility location for security clearance, prior to leaving the correctional facility.
- Prior to working independently in a correctional environment, employees should know all of the rules, regulations, policies, and procedures of the facility in which they are servicing.
- In the event of an emergency evacuation, all Keefe personnel will follow the instructions of the facility staff; in the immediate area of the facility they are located.
- As part of the training required to work in a correctional environment, all Keefe employees should be knowledgeable and trained on their surroundings. The employee should be knowledgeable on how to react and

where to go in times which call for immediate evacuation, such as fire, riot, etc. This will be necessary in times where facility staff is unable to provide safe passage.

- It is imperative that all Keefe personnel are accounted for at all times while in the facility. All Keefe employees shall check in and out of the facility for security clearance, in compliance with the rules and regulations of the facility. Supervisors will make every effort to have all personnel enter and leave a secured area at the same time. Wandering around, going to visit friends/family in other areas of the facility is not permitted at any time.
- Upon reporting to work in a correctional environment, employees should bring as few personal items as necessary. Pocketbooks and large bags should be secured in the trunk of your vehicle and not brought into the facility. Employees should remember that anything brought into the facility has the chance of being misplaced or stolen and is subject to search up to and including seizure.
- Depending on the rules of the facility and duties you are performing, the following items are generally the only items which may be allowed to be brought into the facility:

pen, pencil, and folder (unless available in the on-site office)
coat, jacket, sweater
car/house keys (which should be secured in a locker provided for you).
facility identification

- Employees in a correctional facility should always remember that they are in a secured environment. This means that anything and everything could be considered a security issue. Employees should exercise good judgment and common sense while in the facility.
- Employees who observe security violations are required to report those violations to a supervisor immediately. Keep in mind that the security of the facility and the safety of everyone inside may depend on it. Violations seeming simple could result in life changing events.
- Items that are considered secure and items which may be used as a weapon, should never be left lying around on desks, tables, or in vehicles. Employees must at all times, maintain physical control over keys, letter openers, and any such other items.
- Employees must never assist offenders in attempting to escape the control of correctional staff. Employees will report immediately, any known escape plan or observation of an attempted escape.
- No employee shall operate equipment without proper training and certification (i.e. fork lift, tug unit, etc.).
- Keefe personnel who unload, load, and/or operate company trucks will ensure that these trucks are secure at all times. If lift gates are being used, the truck must be running to power the lift gate. An employee must remain in the cab of the truck to maintain control of the vehicle. The vehicle will never be left unattended for any reason while it is running. Additionally, keys should never be left in an unattended truck or vehicle.
- Any violation of the facility's contraband policy could have stiff penalties, up to and including a felony charge. Contraband may be defined in either of the following two ways:
 1. Any item which is restricted from being brought into the facility including items that are considered legal and illegal outside of the facility.
 2. Any item passed to an offender in which the offender is not entitled to receive. This may include weapons, letters, phone numbers, personal information, and commissary, which have not been properly paid for. In addition, employees are forbidden to receive any information such as letters, addresses, phone numbers, etc. from offenders that is not directly related to commissary services.

Examples of contraband may include, but are not limited to the following:

any item, legal or illegal, which is not permitted in the facility
any item which the inmate is not entitled to
weapons of any kind including box cutters or cutting devices of any kind
hoop style earrings
aerosol cans
combs, brushes, and makeup
nail clippers and files
compact mirrors
newspapers and magazines
cell phones and pagers
lap top computers
credit cards
excess cash
commissary, which has not been properly paid for

- Any employee who receives items of contraband from an offender must report the incident to their supervisor immediately. For instance, if an inmate hands you a personal letter, you must turn that letter over to your supervisor, immediately.
- Employees should report immediately, any offender in the facility, which the employee may personally know. Only a Keefe employee who has had no prior relation or contact, outside of the normal commissary services, should perform commissary services to the offenders.
- No employee will fraternize in any way with offenders or staff, in a correctional environment. All contact with offenders and staff will be related to the provision of commissary services.
- No employee will visit any offender incarcerated in the correctional facility in which they work, without prior approval from both the facility and Keefe. This includes offender visitations while off company time. Employees may not use their facility identification as a means to enter the facility to visit an inmate, even when the facility and Keefe have approved the visit.
- All offenders will be positively identified, prior to receiving their commissary order. Generally, facilities require offenders to possess some type of identification such as a wristband or i.d. card. When positively identifying the offender, the picture, name, and identification number should be checked and verified.
- Once the identification process is completed, the offender should receive their order and a copy of the 2-ply order receipt. The Keefe employee will witness the examination of the order by the offender. Keefe should document any and all problems with the order, which will result in a credit or replacement, on both copies of the 2-ply order receipt. Once an order is accepted and verified by the offender, the Keefe employee must retain a signed copy of the 2-ply order receipt. The Keefe delivery agent should also inform the offender one last time, that once they leave the immediate area, the sale is final and no additional reported damages or shortages will be credited or replaced. Keefe should process credits and replacements in a timely manner. Generally, the acceptable time period is within 24 hours. Inmates will not open bags; they will view through the sealed bag.
- Usually with the provision of on-site commissary services in a correctional environment, Keefe will be responsible for various keys to locked doors, cabinets, drawers, and areas inside of the facility. It is imperative that these keys are at all times, secured and accounted for.
- A locked master key box should be located in an outer commissary office. Management, supervisors, and administrative staff are the only Keefe personnel that should have access to the master key box.
- A key control log listing all keys contained in the box should be kept separately and secured by the supervisors.

- For security and accountability reasons, any time a key is removed from the key box, the key will be signed out, in the key control log. The manager, supervisor, or administrative staff will conduct an inventory of all keys each day.
- Assigned keys will at all times, remain in the secured possession of the employee in which the key was assigned to. Employees are never to pass a key that they have signed for, to another employee to turn in. Only the employee with whom the key was assigned to should turn in, the key.
- Employees should never give or loan keys to offenders.
- Employees should never allow offenders to examine keys. Even from a distance, offenders have been known to make copies of keys from memory.
- All keys will be exchanged *'hand to hand'*. Keys should never be tossed or thrown.
- Keys should never be placed in an open area such as a delivery cart or on a desk.
- If at any time, an employee misplaces or loses a key, it will be reported immediately to a manager or supervisor, and to the facility.
- At no time is any employee authorized to take such keys off the facility grounds, unless authorized by both the facility and Keefe.
- All requests for having a duplicate key made will be approved in writing by both the facility and Keefe management.
- Any employee hurt or injured in any way will immediately report the injury to their supervisor or manager. If the injury requires medical attention, the employee will be taken to a local hospital. As part of the training required to work in a correctional environment, all employees should be knowledgeable of the facility's medical procedures and the location of the local hospital.
- At no time, will any injured employee be left alone while proper medical care is being sought or when the employee is being taken to any first aid station or medical facility.
- The supervisor or manager will create and submit a written report to the facility, detailing all facts and times concerning the injury. This report will be completed and submitted in a timely manner, prior to the end of the day.
- All employees injured on the job will submit to a drug screening within 48 hours.
- All incidents, which take place in a correctional environment, must be reported to a supervisor or manager, and to the facility.
- All employees associated with an incident will be required to submit a written report concerning all facts and times of the incident. This report must be completed and submitted to the supervisor or manager, prior to the end of the day.
- Upon review from the supervisor or manager, the report will be provided to the facility. Examples of incidents which may require reporting include but are not limited to the following:

Late Trucks
Injured personnel
Accidents of any kind
Any changes in the preset commissary schedule

Serious personnel issues
Security violations
Computer problems
Incidents involving Keefe staff and Facility staff or Offenders

- Inmate grievances should be handled in compliance with the policies and times of the facility. Generally, all grievances are to be handled in the following manner:

1. Keefe will respond to all grievances within 24 hours of receipt. The only exception would be grievances received after the close of regular business hours on Monday. Those grievances should be considered to have been received at the start of business on Tuesday.

2. All grievances received will first be documented into the grievance log. Once this process is completed, the grievance is researched and answered. Any necessary actions to resolve the grievance is completed and included in the documented response.

3. The resolution is then documented into the grievance log with a brief description of the resolution. Keefe retains a copy for their permanent records. The offender and facility will be provided a copy of the resolved grievance in accordance with the rules and policies of the facility.

- Every employee will practice good housekeeping. The eating areas, desks, warehouse, and office areas will be kept clean and neat at all times. Employees should keep in mind that Keefe does not own these offices and work areas. Because we are guests in the facility, every extra effort should be made to keep clean the entire area under our control.
- Trash will be emptied daily. Tables in the break area will be washed daily. General cleanup of the office and all work areas should be performed by the close of each day. A detailed listing of all daily housekeeping should be created and followed.
- The drug and alcohol policy may be found in the employee handbook. Any violation of the policy may result in disciplinary action, up to and including termination.
- Employees will not consume alcohol eight (8) hours prior to reporting to work. Employees who report to work with any traces or scent of alcohol will be denied access to the facility. Disciplinary action up to and including termination will follow.
- It is the policy of Keefe that any employee, who is arrested for any reason, will notify their supervisor within 24 hours of the arrest. This does not necessarily mean that an employee will be however; the employee's security pass may be suspended pending an internal investigation. Failure to timely comply with this policy may result in appropriate discipline, up to and including termination.